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the previous offense is barred by the statute of limitations,¹² or was committed in another jurisdiction.¹³ But evidence of similar acts with other women is not admissible.¹⁴ It may be said that one who is accustomed to indulge his passions with women generally is more likely to have done so with a particular woman. But the probability is not so strong as in the principal cases. Moreover, evidence of promiscuous intercourse is nothing but evidence of bad character which is excluded whatever its probative force.¹⁵

RECENT CASES.

ADMIRALTY — TORTS — DAMAGES RECOVERABLE FROM ONE OF TWO VESSELS AT FAULT. — In a collision between vessels A and B in which both were at fault, the cargo on A was damaged. An action was brought, and both vessels were in court. The cargo-owner could probably recover nothing from A. *Held*, that he can recover from B only half of the amount of his damage. *The Drumlanrig*, [1910] P. 249.

At common law, a person damaged by the tort of several tortfeasors can usually get full compensation from any one of them. See *Halsey v. Woodruff*, 9 Pick. (Mass.) 555. But *cf.* 23 HARV. L. REV. 406. In the old English admiralty court, however, it was held that only one-half could be recovered from either of two vessels at fault. *The Milan*, Lush. 388. The latest case follows this decision only because it is regarded as establishing an admiralty rule within the meaning of sec. 25, sub-sec. 9 of the Judicature Act, 1873, two of the lords justices admitting that it is indefensible on principle. See *Chartered Mercantile Bank of India v. Netherlands India Steam Navigation Co.*, 10 Q. B. D. 521. In this country, if both vessels are in court and each is able to pay half, a decree is entered for a moiety against each. *The Sterling and The Equator*, 106 U. S. 647; *The Washington and The Gregory*, 9 Wall. (U. S.) 513. But where the libellant cannot be made whole in this way, the more valuable vessel is held for the balance. *The Alabama and The Game-Cock*, 92 U. S. 695. And even if he libels but one vessel, he is allowed complete compensation from its proceeds, the libellee then having a right of contribution from the other tortfeasor. See *Erie R. Co. v. Erie & Western Transportation Co.*, 204 U. S. 220. The same rights are given even where a shipper is barred by the Harter Act from recovering anything against one of the vessels. See 16 HARV. L. REV. 171-177. But see HUGHES, ADMIRALTY, 278, 279. And *cf.* *The Maine*, 161 Fed. 401.

ALIENS — NATURALIZATION — "FREE WHITE PERSONS." — A Parsee applied for naturalization. *Held*, that he should be admitted. *United States v. Balsara*, 180 Fed. 694 (C. C. A., Second Circ.).

For a discussion of the principles involved, see 23 HARV. L. REV. 561.

BANKRUPTCY — PROVABLE CLAIMS — RENT ON UNEXPIRED LEASE. — A lease provided that the lessor could reënter if the rent was not paid or the lessee became bankrupt, and that the lessee should pay the difference between the rent reserved and that collectible from other sources. The lessee became

¹² *Taylor v. State*, 110 Ga. 150.

¹³ *State v. Snover*, *supra*.

¹⁴ *McAllister v. State*, 112 Wis. 496; *Nicholizack v. State*, 75 Neb. 27.

¹⁵ *State v. Lapage*, 57 N. H. 245.